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Respondent on behalf of Hallam Land Management Ltd & Seabridge Developments

Matter2: Duty to Co-operate

TELFORD & WREKIN LOCAL PLAN 2011-2031: CORE STRATEGY EXAMINATION MATTERS, ISSUES AND QUESTIONS.

MATTER 2 – DUTY TO CO-OPERATE & RELATIONSHIP TO OTHER PLAN AREAS

2.1 Has the Council satisfied the Duty to Co-operate set out in section 33A of the Planning and Compulsory Purchase Act 2004?

The Duty to Co-operate is a critical legal requirement of the Local Plan (as well as being a test of soundness against the NPPF within the overall assessment of the Local Plan). We accept that the Council has broadly adhered to the legal requirement within Section 33A of the PCPA 2004 insofar as there is evidence that communications have been established with neighbouring authorities but we are not convinced that the 'test' of soundness has been adequately met.

In practice, the Council's Duty to Co-operate Statement, is merely 'work in progress' and falls well short of the actual DTC requirements. It simply lists the neighbouring authorities and bodies which it has consulted and the range of topics covered. It does not record what discussions have taken place or what those discussions have achieved or more important how any disagreements are to be resolved. In short, it leaves far too many matters unresolved and hence it fails to serve its purpose.

This stems in particular from the Council's implicit decision to depart from its former role as a New Town and a Growth Point for Shropshire, the West Midlands region and indeed the rest of the country and to allow Telford to resort to a more local function as a maturing town within a rural area, apparently unrelated to its wider hinterland.

2.2 Given that the Plan seeks to set a housing requirement that exceeds its stated assessment of Telford & Wrekin's housing needs, is the Council's position of not seeking to meet any unmet housing demand from the West Midlands conurbation or South Staffordshire sufficiently justified?

The calculation of 'Objectively Assessed Housing Needs' depends fundamentally upon the assumptions made and this needs to be taken into account in judging whether the OAHN is truly representative of the genuine housing needs – according to the methodology outlined in the Government's Planning Practice Guidance note. As we have already outlined within Matter 1 we are not convinced that the correct approach has been followed in relation to the economic impact or the market signals and therefore the 15,555 housing requirement against the alleged 9,940 OAHN must be viewed in that context.

The proposed relationship between Telford and the rest of the West Midlands conurbation is confused. On the one hand, the Council clearly wishes to see a healthy, growing and vibrant economy whereby the town attracts business and investment from further afield. Against that background, the Council is an affiliated member of the new West Midlands Combined Authority. Yet on the other hand, the Council fails to acknowledge the need to attract the workforce which will be needed to support a growing economy. In a move which echoes the country's 'Brexit' decision, Telford apparently wants the business without actually welcoming the people.

A statement in Document F2 of the Examination Documents states bluntly that '*The Council has concluded that it is both inappropriate and unreasonable to accommodate any of the unmet housing need from the West Midlands conurbation or South Staffordshire. The Submission version of the Local Plan has been amended at paragraph 1.3.2.3 to reflect this*'. This statement underlines the overtly political nature of this Local Plan.

The 2015 Peter Brett Associates report (commissioned on behalf of the West Midlands Metropolitan Authorities) identified a 38,000 housing overspill from Birmingham, the Black Country and Solihull over the period to 2028 to be accommodated in areas outside the wider West Midlands Metropolitan Housing market area. These additional homes will be needed to address the needs of the Birmingham Development Plan – which is currently subject to a 'holding direction' by the Government and include Telford as an example of an authority which could accommodate an element of the metropolitan housing requirement.

The 2015 Peter Brett Associates Report, commissioned by Telford Borough Council, on the other hand, determines the 'Objectively Assessed Housing Needs' (OAHN) of the Borough by ignoring the natural migration relationships with the wider West Midlands area. In doing so, the report defines the Telford Strategic Housing Market Area as being identical to the Borough boundary. This draws the boundaries of HMA right up against the edge of the built up area on both the eastern and southern boundaries of the town – with only a small rural hinterland to the north and west.

The assessment of the OAHN uses the definition of the Housing Market Area as a starting point. The apparent justification for defining the HMA as the Borough boundary relates to the level of 'containment' within the Housing Market Area set against the 70% containment target. This is explained within paragraphs 2.12 – 2.21 of the PBA report. However, this exercise simply measures the origin and destination of migrants and commuters over one year prior to the 2011 census and ignores the former role of the New Town. 2010 was a particularly slack period of housebuilding immediately following the 2008/9 Economic Recession when few people would have had the resources or the opportunity to move out from the West Midlands conurbation and when so few houses were being built.

In any event, as Table 2.1 of the report shows, even using the single year of 2010/2011, the 70% containment target which was the benchmark for determining the boundary of the HMA, was not actually quite reached. Above all, this decision completely ignored both the historic role of Telford as a destination for intra and inter-regional migration and also Telford's stated ambitions to attract more growth.

Whilst it might have been both politically and statistically convenient to define the Strategic Housing Market Area as the Telford Borough boundary, the OAN figure is therefore purely representative of a 'local housing need' not a 'strategic housing need' which looks at the actual needs of Telford to meet its requirements.

What are the implications of the/ findings in paragraph 6.13 of the PBA 'OAHN' report.

This passage of the report highlights the historical relationships between Telford & Wrekin and the Black Country and the wider West Midlands conurbation and suggests that *'Telford and Wrekinmay be well placed to resume this role as unmet need ripples outwards from Birmingham'*. It goes on to suggest that *'importing need in this way could benefit both areas – the donor areas by relieving capacity constraints and Telford and Wrekin by helping to make more sustainable settlements pay for affordable housing and support necessary infrastructure. This option will be considered in Stage 3 of the Greater Birmingham, Solihull and Black Country Strategic Housing Study, which has just started.'*

There are three key points to make arising from this statement:-

Firstly, as a member of the GBSLEP Planning Sub-Group which over-saw the PBA study (referred to above), I am acutely aware of the current situation relating to the West Midlands Strategic Housing work. The PBA Stage 3 work was completed and published in September 2015, but the West Midlands local Authorities (including those within the wider housing market) have been considering and negotiating on the distribution of housing ever since, but in the absence of a decision on the Birmingham Development Plan, no decisions have yet been made on the outcome of the West Midlands Strategic Housing work.

Secondly, the households 'generated' by Birmingham which form the basis of the potential overspill, should not be treated as 'aliens'. They are simply people who have grown up in Birmingham and the Black Country or who have moved to the West Midlands conurbation as students, young single people or couples or as migrants from other areas – as part of their normal life cycle. Cities naturally act as reception areas for young and single people, who later migrate to more rural (and maybe more affluent) parts of the region when they wish to start a family, settle down or retire. It is both cynical and opportunist for Telford and Wrekin to therefore use their position as a 'receptor authority' to seek funding for infrastructure and affordable housing when so much public investment has already been devoted to the New Town, and

Finally, it is completely illogical and inconsistent for a former New Town which until recently served as a Growth Point for the region (and still has ambitions to attract international economic investment), to 'throttle back' on meeting housing needs when the Government is emphasising the need for Council's to help deliver more housing and has a target of 1,000,000 more homes in this Parliament. The Council's position on this is fundamentally schizophrenic. If the Council can claim that its economic market area is broader, then so too must its housing influence.

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